

EXHIBIT B

to

*House Defendants' and Senate Defendants'
Objections to Plaintiffs' Rule 26(a)(3)
Disclosures*

HOUSE DEFENDANTS' OBJECTIONS TO PLAINTIFFS' EXHIBIT LIST
SC NAACP and Taiwan Scott v. Alexander, et al.

Exhibit #	Description	Bates Number (if applicable)	Objection
1	House Defendants James H. Lucas, Chris Murphy and Wallace H. Jordan's Answers to Plaintiffs' First Set of Interrogatories Re The Congressional Plan		Hearsay; Relevance
2	Senate Defendants' Objections and Responses to Plaintiffs' First Set of Interrogatories to Defendants Re The Congressional Map		Hearsay; Relevance
3	House Defendants James H. Lucas, Chris Murphy, and Wallace H. Jordan's Responses to Plaintiffs' First Set of Requests For Admission and Second Set of Interrogatories to Senate Defendants Re The Congressional Map		Hearsay; Relevance
4	Senate Defendants' Objections and Responses to Plaintiffs' First Set of Requests For Admission and Second Set of Interrogatories to Senate Defendants Re The Congressional Map		Hearsay; Relevance
5	Email from J. Cusick dated August 9, 2021 re: Letter to the House Redistricting Ad Hoc Committee	SC_HOUSE_0007622	Hearsay; Foundation; Incomplete
6	Letter to Redistricting Ad Hoc Committee (August 9, 2021)	SC_HOUSE_0007623- SC_HOUSE_0007638	Hearsay; Foundation; Incomplete
7	Email from S. Lance dated August 30, 2021 re: Follow -up Letter to the House Redistricting Ad Hoc Committee	SC_HOUSE_0007690	Hearsay; Foundation; Incomplete
8	Letter to Redistricting Ad Hoc Committee dated August 30, 2021	SC_HOUSE_0007691- SC_HOUSE_0007695	Hearsay; Foundation; Incomplete
9	Letter to Redistricting Ad Hoc Committee (September 27, 2021)	SC_HOUSE_0007876- SC_HOUSE_0007881	Hearsay; Foundation; Incomplete
10	Email from L. Aden dated October 8, 2021 re: Proposed Congressional and House Map Submissions	SC_HOUSE_0091539- SC_HOUSE_0091540	Hearsay; Foundation; Incomplete
11	Letter to Redistricting Ad Hoc Committee- dated October 8, 2021	SC_HOUSE_0091541- SC_HOUSE_0091553	Hearsay; Foundation; Incomplete
12	Appendix to October 8, 2021 letter to Redistricting Ad Hoc Committee	SC_HOUSE_0091554- SC_HOUSE_0091598	Hearsay; Foundation; Incomplete
13	Email from L. Aden dated November 19, 2019 re: Letter to the House Leadership and the House Judiciary Committee	SC_HOUSE_0091404	Hearsay; Foundation; Incomplete
14	Letter to SC House Judiciary Committee dated November 19, 2021	SC_HOUSE_0091405- SC_HOUSE_0091409	Hearsay; Foundation; Incomplete

Exhibit #	Description	Bates Number (if applicable)	Objection
15	Email from L. Aden dated November 30, 2021 re: Supplemental Comments on the House Judiciary Committee's Proposed House Redistricting Plan	SC_HOUSE_0009366- SC_HOUSE_0009367	Hearsay; Foundation; Incomplete
16	Second Set of Supplemental Comments on House Judiciary Committee's Proposed House Plan (dated November 30, 2021)	SC_HOUSE_0009368- SC_HOUSE_0009378	Hearsay; Foundation; Incomplete
17	Expert Report of Joseph Bagley, Ph.D. with Curriculum Vitae, dated April 11, 2022		Rule 702/Daubert; Relevance; Hearsay; Incomplete
18	Rebuttal Report of Joseph Bagley, Ph.D., dated May 3, 2022		Rule 702/Daubert; Relevance; Hearsay; Incomplete
19	Expert Report Evaluating South Carolina's Congressional Map of Dr. Jordan Ragusa with Curriculum Vitae, dated April 11, 2022		Rule 702/Daubert; Relevance; Hearsay; Incomplete
20	Analysis of CD #1 [Ragusa Report Table 1]		Rule 702/Daubert; Relevance; Hearsay
21	Analysis of CD #2 [Ragusa Report Table 2]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
22	Analysis of CD #3 [Ragusa Report Table 3]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
23	Analysis of CD #4 [Ragusa Report Table 4]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
24	Analysis of CD #5 [Ragusa Report Table 5]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
25	Analysis of CD #6 [Ragusa Report Table 6]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
26	Congressional Rebuttal Expert Report of Dr. Jordan Ragusa, dated May 4, 2022		Rule 702/Daubert; Relevance; Hearsay; Incomplete
27	CD #1 County Cores [Ragusa Report Table 1]		Rule 702/Daubert; Relevance;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Hearsay; Incomplete
28	CD #1 County BVAP & Population [Ragusa Report Table 2]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
29	Analysis of CD #1 [Ragusa Report Table 3]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
30	VTDs Removed from CD #1 [Ragusa Report Figure 1]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
31	BVAP Change [Ragusa Report Table 4]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
32	Expert Report of Kosuke Imai, Ph.D. with Curriculum Vitae, dated April 4, 2022		Rule 702/Daubert; Relevance; Hearsay; Incomplete
33	The Boundary between Districts 1 & 6 [Imai Report Figure 1]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
34	Histogram represents the distribution of the Black voting-age population (BVAP) proportion for District 1, across 10,000 race-blind simulated plans. [Imai Report Figure 2]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
35	Histogram represents the distribution of the Black voting-age population (BVAP), across 10,000 race-blind simulated plans, who live in Charleston County & are assigned to District 1. [Imai Report Figure 3]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
36	BVAP Proportion in District 1. Histogram represents the distribution of the Black voting-age population (BVAP) proportion, across 10,000 statewide simulated plans with the VRA constraint, within District 1.[Imai Report Figure 4]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
37	The Boundary of District 1 and 6 in the Statewide Simulation with the Voting Rights Act (VRA) Constraint. [Imai Report Figure 5]		Rule 702/Daubert; Relevance; Hearsay; Incomplete
38	Histogram represents the distribution of the Black voting-age population (BVAP), across 10,000 statewide simulated plans with the VRA constraint, who live in Charleston County and are assigned to District 1. [Imai Report Figure 6]		Rule 702/Daubert; Relevance; Hearsay; Incomplete

Exhibit #	Description	Bates Number (if applicable)	Objection
39	Analysis of Richland County in the Statewide Simulation with the Voting Rights Act (VRA) Constraint. [Imai Report Figure 7]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
40	The distribution of Black voting-age population (BVAP) across the subset of plans in which Richland county is split only into Districts 2 and 6. [Imai Report Figure 8]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
41	Analysis of Sumter County in the Statewide Simulation with the Voting Rights Act (VRA) Constraint. [Imai Report Figure 9]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
42	Frequency of Pairings of Districts in Sumter County in Statewide VRA Simulation. [Imai Report Table 1}		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
43	Compactness of Simulations Measured by the Polsby Popper Score. [Imai Report - Appendix Figure 10]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
44	Compactness of Simulations Measured by the Fraction of Edges Kept. [Imai Report - Appendix Figure 11]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
45	County splits in simulation. The histogram shows the distribution of the number of split counties under the simulated plans while the red vertical line shows the enacted plan. [Imai Report - Appendix Figure 12]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
46	Municipality splits in simulation. The histogram shows the distribution of the number of split municipalities under the simulated plans while the red vertical line shows the enacted plan. [Imai Report - Appendix Figure 13]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
47	Precinct or Voting Tabulation District (VTD) splits in the simulation. The histogram shows the distribution of the number of split VTDs under the simulated plans while the red vertical line shows the enacted plan. [Imai Report - Appendix Figure 14]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
48	Expert Report of Baodong Liu, Ph.D. re; S.865 (South Carolina's Congressional Map) with Curriculum Vitae, dated April 2, 2022		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
49	Estimated Racial Support for Black Candidate in Endogenous Elections (General Elections) [Liu Report Table 1]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete

Exhibit #	Description	Bates Number (if applicable)	Objection
50	Estimated Racial Support for Black Candidate in Endogenous Elections (Primary Elections) [Liu Report Table 2]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
51	Estimated Racial Support for Black Candidate in Exogenous Elections [Liu Report Table 3]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
52	Effective Analyses for Enacted Congressional Redistricting Plans, SC [Liu Report Table 4]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
53	How VTDs were moved around based on the Enacted CD Plan? [Liu Report Table 5]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
54	Race v Party in CD 1 of Enacted Plan, South Carolina [Liu Report Table 6]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
55	Visualizing Race v Party of CD 1 of Enacted Plan, South Carolina [Liu Report Figure 1]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
56	Race v Party in CD 2 of Enacted Plan, South Carolina [Liu Report Table 7]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
57	Visualizing Race v Party of CD 2 of Enacted Plan, South Carolina [Liu Report Figure 2]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
58	Enacted CD 1 and Assignments of Voters from the Envelope [Liu Report Table 8]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
59	Enacted CD 1 and Assignments of Voters—race v. party [Liu Report Table 9]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
60	Enacted CD 2 and Assignments of Voters—race v. party [Liu Report Table 10]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
61	Enacted CD 2 and Assignments of Voters—race v. party [Liu Report Table 11]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay;

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			Incomplete
62	Rebuttal Report of Baodong Liu, Ph.D. re Congressional Map, dated May 2, 2022		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
63	The Methodologies of Trend and Liu, Compared [Liu Report Table 1]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
64	Split Counties based on Enacted Plan [Liu Report Table 2]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
65	The Racial Composition of Split Counties, Enacted Plan [Liu Report Table 3]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
66	Split Counties v. Non-Split Counties [Liu Report Figure 1]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
67	Report on South Carolina by Dr. Moon Duchin with CV, dated April 11, 2022		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
68	This choropleth map shows the share of Black voting age population shaded by VTD (i.e., by voting precinct) across South Carolina, overlaid with the boundaries of the 46 counties [Duchin Report Figure 1]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
69	These maps show the shifts in Black population in South Carolina, according to American Community Survey estimates comparing 2010 and 2019. [Duchin Report Figure 2]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
70	The first table gives Black voting age population share by district for the plans under consideration. [Duchin Report Table 1]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
71	Population deviation in each plan. [Duchin Report Table 2]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
72	Comparing compactness scores via one discrete and two contour-based metrics [Duchin Report Table 3]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete

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73	This table presents the number of county and county subdivision splits and pieces in each plan. [Duchin Report Table 4]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
74	This table presents city and town splits for each plan, with both territory splits and population splits shown. [Duchin Report Table 5]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
75	Terrain moved in and out of CD 6. Areas are colored in terms of their district reassignment. [Duchin Report Figure 3]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
76	CD 1 is highlighted, with the Black voting age population as in Figure 1 and split cities outlined in red. [Duchin Report Figure 4]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
77	North Charleston is split between CD 1 and CD 6 as the district line winds between counties, in and out of the city, and through neighborhoods with significant Black population. [Duchin Report Figure 5]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
78	CD 2 is highlighted, with the Black voting age population as in Figure 1 and split cities outlined in red. [Duchin Report Figure 6]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
79	District lines wrap around and divide the city of Columbia. [Duchin Report Figure 7]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
80	CD 5 is highlighted, with the Black voting age population shown as in Figure 1 and the split city of Sumter (pop. 43,463) outlined in red. [Duchin Report Figure 8]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
81	Sumter, a small majority-Black city cited in public testimony as an important community, is split in the state's map as the CD 5/CD 6 dividing line winds through a heavily Black region [Duchin Report Figure 9]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
82	This histogram compares the district with <i>second-highest</i> BVAP in three current plans to those from 100,000 alternative plans [Duchin Figure 10]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
83	Histogram of BVAP in the second-highest district, comparing the low BVAP observed in the proposed plan to an ensemble of 100,000 sample plans that redraw only districts 1, 2, 5, and 6. [Duchin Report Figure 11]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete

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84	Effectiveness score across each proposed congressional plan in the four elections identified as probative for Black electoral opportunity. [Duchin Report Table 7]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
85	The comparison to 100,000 neutral plans shows that maps with such low levels of opportunity for Black voters are rarely found by chance (top), while the generic Democratic performance is much more typical (bottom). [Duchin Report Figure 12]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
86	A selection of COIs identified in public testimony. [Duchin Report Figure 13]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
87	Rebuttal Report on South Carolina by Dr. Moon Duchin, dated May 4, 2022		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
88	BVAP shares by district. (Repeated from previous report, Table 1.) [Duchin Rebuttal Report Table 1]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
89	South Carolina Legislature Hearing Transcript - Senate Judiciary Redistricting Subcommittee July 20, 2021		Inadequately identified; Hearsay
90	South Carolina Legislature Hearing Transcript - House Judiciary Redistricting August 3, 2021		Inadequately identified; Hearsay
91	South Carolina Legislature Hearing Transcript - Senate Judiciary Redistricting Subcommittee September 17, 2021		Inadequately identified; Hearsay
92	South Carolina Legislature Hearing Transcript - Senate Judiciary Redistricting Subcommittee October 21, 2021		Inadequately identified; Hearsay
93	South Carolina Legislature Hearing Transcript - Senate Judiciary Redistricting Subcommittee November 4, 2021		Inadequately identified; Hearsay
94	South Carolina Legislature Hearing Transcript - House Judiciary Redistricting November 10, 2021		Inadequately identified; Hearsay
95	South Carolina Legislature Hearing Transcript - Senate Judiciary Redistricting Subcommittee November 12, 2021		Inadequately identified; Hearsay
96	South Carolina Legislature Hearing Transcript - House Judiciary Full Committee November 16, 2021		Inadequately identified; Hearsay

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97	South Carolina Legislature Hearing Transcript - House Judiciary Redistricting November 16, 2021		Inadequately identified; Hearsay
98	South Carolina Legislature Hearing Transcript - Senate Judiciary Redistricting Subcommittee November 29, 2021		Inadequately identified; Hearsay
99	South Carolina Legislature Hearing Transcript - House of Representatives December 1, 2021		Inadequately identified; Hearsay
100	South Carolina Legislature Hearing Transcript- House of Representatives December 2, 2021		Inadequately identified; Hearsay
101	South Carolina Legislature Hearing Transcript- Senate December 6, 2021 - (Part 1)		Inadequately identified; Hearsay
102	South Carolina Legislature Hearing Transcript- Senate December 6, 2021 - (Part 2)		Inadequately identified; Hearsay
103	South Carolina Legislature Hearing Transcript- Senate December 7, 2021 - (Part 1)		Inadequately identified; Hearsay
104	South Carolina Legislature Hearing Transcript- Senate December 7, 2021 - (Part 2)		Inadequately identified; Hearsay
105	South Carolina Legislature Hearing Transcript - House of Representatives December 9, 2021		Inadequately identified; Hearsay
106	South Carolina Legislature Hearing Transcript - House of Representatives December 10, 2021		Inadequately identified; Hearsay
107	South Carolina Legislature Hearing Transcript - House Judiciary Redistricting December 16, 2021		Inadequately identified; Hearsay
108	South Carolina Legislature Hearing Transcript - House Judiciary Full Committee January 10, 2022 - (Part 1 Revised)		Inadequately identified; Hearsay
109	South Carolina Legislature Hearing Transcript - House Judiciary Redistricting January 10, 2022 - (Part 2 Revised)		Inadequately identified; Hearsay
110	South Carolina Legislature Hearing Transcript - House of Representatives January 11, 2022 - (Part1)		Inadequately identified; Hearsay
111	South Carolina Legislature Hearing Transcript - House of Representatives January 11, 2022 - (Part 2)		Inadequately identified; Hearsay
112	South Carolina Legislature Hearing Transcript - House of Representatives January 12, 2022		Inadequately identified; Hearsay
113	South Carolina Legislature Hearing Transcript - House of Representatives January 13, 2022		Inadequately identified; Hearsay

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114	South Carolina Legislature Hearing Transcript - Senate Judiciary Redistricting Subcommittee January 13, 2022		Inadequately identified; Hearsay
115	South Carolina Legislature Hearing Transcript - Senate Judiciary Committee January 19, 2022		Inadequately identified; Hearsay
116	South Carolina Legislature Hearing Transcript - Senate Proceedings January 20, 2022		Inadequately identified; Hearsay
117	South Carolina Legislature Hearing Transcript - House Proceedings January 25, 2022		Inadequately identified; Hearsay
118	South Carolina Legislature Hearing Transcript - House of Representatives January 26, 2022 - (Part 1)		Inadequately identified; Hearsay
119	South Carolina Legislature Hearing Transcript - House of Representatives January 26, 2022 - (Part 2)		Inadequately identified; Hearsay
120	Supplemental Information on South Carolina Congressional Districts by Dr. Moon Duchin dated August 9, 2022		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
121	BVAP [Duchin Supplemental Report Figure 1]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
122	Pres20 - Biden/Harris - statewide share .441 [Duchin Supplemental Report Table 1]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
123	Sen20 - Harrison - statewide share .448 [Duchin Supplemental Report Table]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
124	SOS18 - Whittenburg - statewide share .429 [Duchin Supplemental Report Table 3]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
125	Tres18 - Glenn - statewide share .432 [Duchin Supplemental Report Table 4]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
126	Assessing the Jessamine Plan [Duchin Supplemental Report Figure 2]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete

Exhibit #	Description	Bates Number (if applicable)	Objection
127	The Jessamine plan has one district in the 40-50% BVAP range and no other districts over 30% BVAP [Duchin Supplemental Report Table 5]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
128	Change in BCVAP from 2010 [Duchin Supplemental Report Figure 3]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
129	Performance tables for remaining elections [Duchin Supplemental Report Table 6 - Governor 2018]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
130	Performance tables for remaining elections [Duchin Supplemental Report Table 7 - Attorney General 2018]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
131	Performance tables for remaining elections [Duchin Supplemental Report Table 8 - President 2016]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
132	Performance tables for remaining elections [Duchin Supplemental Report Table 9 - U.S. Senate 2016]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
133	Performance tables for remaining elections [Duchin Supplemental Report Table 10 - Senate 2014]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
134	Performance tables for remaining elections [Duchin Supplemental Report Table 11 - Governor 2014]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
135	Performance tables for remaining elections [Duchin Supplemental Report Table 12 - Lt. Governor 2014]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
136	Performance tables for remaining elections [Duchin Supplemental Report Table 13 - Secretary of State 2014]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
137	Performance tables for remaining elections [Duchin Supplemental Report Table 14 - Superintendent of Education 2014]		Rule 702/ <i>Daubert</i> ; Relevance; Hearsay; Incomplete
138	Deposition of Thomas Brunell, Ph.D. March 31, 2022		Relevance; Foundation;
139	Ex. 1- Report on Racial Bloc Voting in South Carolina		Confusion;

Exhibit #	Description	Bates Number (if applicable)	Objection
140	Ex. 3 - Expert Report of Baodong Liu, Ph.D., January 24, 2022		Hearsay; Inadequate identification
141	Ex. 4 - Rebuttal Report of Baodong Liu, Ph.D.		
142	Ex. 5 - Expert Report of Dr. Jordan Ragusa: Evaluating South Carolina's State House Map		
143	Ex. 6 - <i>Rethinking Redistricting: How Drawing Uncompetitive Districts Eliminates Gerrymanders, Enhances Representation, and Improves Attitudes Towards Congress</i>		
144	Ex. 7 - <i>Why Competitive Elections are Bad for America</i>		
145	Ex. 8 - Curriculum Vitae - Thomas L. Brunell		
146	Ex. 9 - South Carolina House of Representatives, Judiciary Committee, Redistricting Ad Hoc Committee, 2021 Guidelines and Criteria for Congressional and Legislative Redistricting		
147	Deposition of Sean Trende April 5, 2022		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
148	Ex. 1- Amended Notice of Deposition		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
149	Ex. 3- <i>NAACP vs. McCrory</i>		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
150	Ex. 4 - <i>Ohio Organizing Collaborative v. Husted</i>		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
151	Ex. 5 - <i>Whitford v. Gill</i>		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
152	Ex. 6 - <i>Fair Fight Action v. Raffensperger</i>		Relevance; Foundation; Confusion;

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			Hearsay; Inadequate identification
153	Ex. 7 - <i>League of Women Voters of Ohio v. Ohio</i>		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
154	Ex. 8 - <i>DNC v. Reagan</i>		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
155	Ex. 9 - Expert Report of Dr. Kosuke Imai		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
156	Ex. 10 - Trende New York Report		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
157	Ex. 11 - <i>Common Cause v. Rucho</i>		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
158	Ex. 12 - New York REDIST Opinion		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
159	Ex. 13 - Expert Report of Dr. Jordan Ragusa		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
160	Ex. 14 - NAACP House Submission		Relevance; Foundation;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Confusion; Hearsay; Inadequate identification
161	Ex. 15 - House Defendants Motion to Dismiss		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
162	Deposition of J. David Woodard, Ph.D. April 6, 2022		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
163	Ex. 1- J. Woodard, Ph.D. -Notice of Deposition		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
164	Ex. 3 - Excerpts from The New Southern Politics, Second Edition, pages 180 and 181		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
165	Ex. 4- Excerpts from The New Southern Politics, Second Edition, pages 240 and 241		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
166	Ex. 5- Excerpts from The New Southern Politics, Second Edition, pages 114 and 115		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
167	Ex. 6- Excerpts from The New Southern Politics, Second Edition, pages 312 and 313		Relevance; Foundation; Confusion; Hearsay; Inadequate identification

Exhibit #	Description	Bates Number (if applicable)	Objection
168	Deposition of Wallace H. Jordan April 13, 2022		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
169	Ex. 3 - Meeting Proceedings (August 3, 2021)		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
170	Ex. 7 - Follow-up Recommendations in S.C. Redistricting Process (September 27, 2021)		Hearsay; Inadequate identification; Foundation; Cumulative
171	Ex. 8 - Submitting Proposed Congressional and House Maps (October 8, 2021)		Hearsay; Inadequate identification; Foundation; Cumulative
172	Ex. 9 - 2021 Redistricting Map Room Policies and Procedures		Inadequate identification; Cumulative
173	Ex. 14- Transcript of House of Representatives Meeting (December 2, 2021)		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
174	Deposition of William Weston J. Newton April 13, 2022		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
175	Ex. 3 - Criteria used by the Ad Hoc Committee adopted for the purpose of the redistricting exercise		Relevance; Foundation; Confusion; Hearsay; Inadequate identification
176	Ex. 4 - Schedule of public hearings		

Exhibit #	Description	Bates Number (if applicable)	Objection
	Ex. 5 - Letter from Steven Lance to Redistricting Ad Hoc Committee re: Duty to Comply with the U.S. Constitution and Voting Rights Act and Recommendations for Transparency, Public Involvement, and Fair Representation in South Carolina's Redistricting Process		Hearsay; Inadequate identification; Foundation; Cumulative
177	Ex. 6 - August 30, 2021 Letter from Steven Lance to Redistricting Ad Hoc Committee re: Follow-up on Recommendations for Transparency, Public Involvement, and Fair Representation in South Carolina's Redistricting Process		Hearsay; Inadequate identification; Foundation; Cumulative
178	Ex. 7 - September 27, 2021 Letter		Hearsay; Inadequate identification; Foundation; Cumulative
179	Ex. 8 - October 8, 2021 Letter		Hearsay; Inadequate identification; Foundation; Cumulative
180	Deposition of Thomas Hauger April 29, 2022		Relevance; Confusion; Hearsay; Cumulative
181	Ex. 1 - Email to Sebastian Bass, et al. from Thomas Hauger, re: Welcome to the SC House Redistricting Team, dated March 1, 2021	SC HOUSE 0102028- SC HOUSE 0102029	
182	Ex. 9 - Email to Brian Leach, et al. from Thomas Hauger, dated March 16, 2021, re: [External] RE: Election Commission Data	SC HOUSE 0102064- SC HOUSE 0102068	
183	Ex. 14 - 2021 Redistricting Map Room Policies and Procedures	SC HOUSE 0091425- SC HOUSE 0091426	
184	Deposition of Emma Dean May 2, 2022		Relevance; Confusion; Hearsay; Cumulative
185	Ex. 3 - Email from Chris Murphy to Patrick Dennis, dated January 7, 2021, re: Tuesday Redistricting Meeting	SC HOUSE 0110398- SC HOUSE 0110399	Relevance; Hearsay
186	Ex. 4 - Email from Tracy Horgan to Thomas Hauger, dated June 30, 2021, re: [2]: Question about State data file pricing	SC HOUSE 0103153- SC HOUSE 0103154	Relevance; Foundation; Hearsay
187	Ex. 5 - Coalition Letter 1, dated August 9, 2021		Inadequately identified; Hearsay; Foundation; Cumulative

Exhibit #	Description	Bates Number (if applicable)	Objection
188	Ex. 6 - Coalition letter 2, dated August 30, 2021		Inadequately identified; Hearsay; Foundation; Cumulative
189	Ex. 7 - Coalition Letter 3, dated September 27, 2021		Inadequately identified; Hearsay; Foundation; Cumulative
190	Ex. 8 - Email from Emma Dean to Jay Jordan et al; dated July 30, 2021, re: August 3rd	SC HOUSE 0108644	
191	Ex. 9 - Redistricting Cases, NCSL, dated April 25, 2019	SC HOUSE 0108646- SC HOUSE 0108653	
192	Ex. 10 - Draft Redistricting Guidelines		Inadequately identified; Relevance
193	Ex. 12 - 2021 Redistricting Map Room Policies and Procedures	SC HOUSE 0070251- SC HOUSE 0070252	Cumulative
194	Ex. 13 - Email from House Redistricting to House Redistricting, dated November 1, 2021, re: Redistricting email from Ch. Murphy	SC HOUSE 0070257	
195	Deposition of James Lucas - (Speaker) May 3, 2022 - (Vol. 1)		Relevance; Confusion; Hearsay; Cumulative
196	Ex. 7 - House Defendants James H. Lucas, Chris Murphy and Wallace H. Jordan's Responses and Objections to Plaintiffs' First Set of Interrogatories, dated January 24, 2022		Relevance; Confusion; Hearsay
197	Ex. 8 - House Defendants James H. Lucas, Chris Murphy and Wallace H. Jordan's Responses and Objections to Plaintiffs' Second Set of Interrogatories, dated January 28, 2022		Relevance; Confusion; Hearsay
198	Ex. 13 - General Assembly Document from the SChousespeaker Website		Relevance; Foundation; Hearsay; Authenticity
199	Ex. 14 - Email from Thomas Hauger to Sebastian Bass and Others, dated March 1, 2021 re: Welcome to the SC House Redistricting Team	SC_HOUSE_0102028- SC_HOUSE_0102029	Relevance; Foundation; Cumulative
200	Placeholder for Murphy v. 1 Ex.15, which is subject to a contested and untimely clawback request by House Defendants		Inadequately identified; Privileged; Relevance
201	Ex. 17 - 2021 Guidelines and Criteria for Congressional and Legislative Redistricting		Inadequately identified; Authenticity; Foundation

Exhibit #	Description	Bates Number (if applicable)	Objection
202	Ex. 20 - September 22, 2021 Jay Lucas on Twitter, SChousespeaker Document		Relevance; Foundation; Hearsay; Authenticity
203	Ex. 21 - Map Room Email	SC_HOUSE_0106830	
204	Ex. 22 - 2021 Redistricting Map Room Policies and Procedures	SC_HOUSE_0091425- SC_HOUSE_0091426	
205	Ex. 23 - October 8, 2021 Email from Leah Aden to House Redistricting and Others and Attachments	SC_HOUSE_0091539- SC_HOUSE_0091553	Hearsay; Foundation; Cumulative
206	Ex. 26 - November 19, 2021 Email from Leah Aden to James Lucas and Others	SC_HOUSE_0009425- SC_HOUSE_0009430	Hearsay; Foundation; Cumulative
207	Ex. 27 - November 30, 2021 Email from Leah Aden to James Lucas and Others and Attachments	SC_HOUSE_0009366- SC_HOUSE_0009378	Hearsay; Foundation; Cumulative
208	Deposition of Chris Murphy May 4, 2022 - (Vol. I)		Relevance; Confusion; Hearsay
209	Ex. 3 - Email from E. Dean dated July 21, 2021 re: Letter from Chairman Murphy	SC_HOUSE_0091615- SC_HOUSE_0091616	
210	Ex. 4 - South Carolina House of Representatives, Judiciary Committee, Redistricting Ad Hoc Committee, 2021 Guidelines and Criteria for Congressional and Legislative Redistricting		Inadequately identified; Authenticity; Foundation
211	Ex. 5 - Email from S.C. House Republican dated October 4, 2021 re: Map Room Information	SC_HOUSE_0110448- SC_HOUSE_0110451	Relevance; Foundation
212	Ex. 7 - Email from C. Murphy dated January 5, 2021 re: Redistricting Conversation	SC_HOUSE_0110498- SC_HOUSE_0110499	Relevance
213	Ex. 8 - Email from C. Murphy dated January 7, 2021 re: Tuesday Redistricting Meeting	SC_HOUSE_0110398- SC_HOUSE_0110399	Relevance
214	Ex. 9 - Email from C. Murphy dated June 17, 2021 re: Redistricting	SC_HOUSE_0110490- SC_HOUSE_0110491	Relevance
215	Ex. 12 - Email from C. Murphy dated September 17, 2021 re: Redistricting Data Discussion	SC_HOUSE_0110454	Relevance
216	Ex. 13 - Murphy texts	SC_HOUSE_0110887-	Relevance; Annoyance; Hearsay
217	Placeholder for Lucas v. 2 Ex. 14, which is subject to a contested and untimely clawback request by House Defendants		Inadequately identified; Privileged; Relevance;
218	Deposition of Wm. Weston Newton June 22, 2022		Relevance; Confusion; Hearsay; Cumulative

Exhibit #	Description	Bates Number (if applicable)	Objection
219	Ex. 1 - 2021 Guidelines and Criteria for Congressional and Legislative Redistricting		Inadequately identified; Authenticity; Foundation
220	Ex. 2 - South Carolina Congressional 11 District Map Subcommittee Plan.		Inadequately identified; Authenticity; Foundation
221	Ex. 3 - Congressional House Staff Plan Map		Inadequately identified; Authenticity; Foundation
222	Ex. 4 - 12-14 Text Message from Xiaodan		Inadequately identified
223	Ex. 5 - Continuation of Text Message from Xiaodan		Inadequately identified; Hearsay
224	Ex. 6 - December 16, 2021 House Judiciary Committee Video Transcription		Inadequately identified; Hearsay; Foundation; Authenticity
225	Ex. 7 - Congressional House Staff Plan Alternative 1 Map		Inadequately identified; Authenticity; Foundation
226	Ex. 8 - December 29, 2021 House Judiciary Committee 19 Video Transcription		Inadequately identified; Hearsay; Authenticity; Foundation
227	Ex. 9 - January 10, 2022 House Judiciary Committee Video Transcription		Inadequately identified; Hearsay Authenticity; Foundation
228	Deposition of Chris Murphy June 23, 2022		Relevance; Confusion; Hearsay; Cumulative
229	Ex. 1 - South Carolina Congressional Districts Map	SC_HOUSE_0091615- SC_HOUSE_0091616	Conflicting descriptions
230	Ex. 2 - Deposition Transcript of		Inadequately identified; Relevance; Hearsay; Cumulative
231	Ex. 3 - January 10, 2022 email from Emma Dean to Chris Murphy re: Draft January 10 Chris Murphy Letter	SC HOUSE 0106698- SC HOUSE 0106699	

Exhibit #	Description	Bates Number (if applicable)	Objection
232	Ex. 4 - South Carolina Congressional Districts Staff Subcommittee Plan		Inadequately identified; Authenticity; Foundation
233	Ex. 5 - Congressional House Staff Plan		Inadequately identified; Authenticity; Foundation
234	Ex. 6 - December 20, 2021 email from Chris Murphy to Emma Dean re Chairmans Retreat January 4 - January 5	SC HOUSE 0111948	Relevance
235	Ex. 7 - Cong House Staff Plan Alternative 1		Inadequately identified; Authenticity; Foundation
236	Deposition of Thomas Hauger June 28, 2022		Relevance; Confusion; Hearsay; Cumulative
237	Ex.1 - April 29, 2022 Hauger Deposition Transcript		Relevance; Hearsay; Cumulative
238	Ex.2 - May 11, 2022 Errata Sheet		Relevance; Hearsay; Cumulative
239	Ex.3 - March 1, 2021 email from Thomas Hauger to Sebastian Bass re: Welcome to the SC House Redistricting Team	SC HOUSE 0102028- SC HOUSE 0102029	Cumulative
240	Ex.4 - November 15, 2021 email from Jennifer Robinson to Pierce McNair re: Research Analyst Ed PW (Nov 2021).pdf	SC HOUSE 0108711	Relevance; Foundation
241	Ex.5 - South Carolina House of Representatives Judiciary Committee Redistricting Guidelines and Criteria for 2021		Inadequately identified; Authenticity; Foundation
242	Ex.6 - March 16, 2021 email from Thomas Hauger to Brian Leach re: [External] Election Commission Data	SC HOUSE 0102064- SC HOUSE 0102068	Cumulative
243	Ex.7 - 2021 Redistricting Map Room Policies and Procedures	SC HOUSE 0106831- SC HOUSE 0106832	Cumulative
244	Ex.8 - December 10, 2021 email from Thomas Hauger to Tommy Kahlow re: Congressional House Staff Plan	SC HOUSE 0106688	Relevance
245	Ex.9 - October 15, 2021 email from Thomas Hauger to Tommy Kahlow re: NAACP Congressional Submission 1	SC HOUSE 0109045	
246	Ex.10 - December 21, 2021 email from Thomas Hauger to Tommy Kahlow re: Redistricting Site Update	SC HOUSE 0106691- SC HOUSE 0106692	
247	Ex.11 - Congressional House Staff Plan		Inadequately identified; Authenticity;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Foundation
248	Deposition of James Lucas July 1, 2022 - (Vol. 2)		Relevance; Confusion; Hearsay; Cumulative
249	Ex. 1 - Map Entitled Congressional House Staff Plan		Inadequately identified; Authenticity; Foundation
250	Ex. 2 - Congressional House Staff Plan Population Summary Dated 12/10/21		Inadequately identified; Authenticity; Foundation
251	Ex. 3 - Congressional House Staff Voting Age Population Summary		Inadequately identified; Authenticity; Foundation
252	Ex. 4 - South Carolina House of Representatives 2021 Guidelines and Criteria for Congressional and Legislative Redistricting		Inadequately identified; Authenticity; Foundation; Cumulative
253	Ex. 5 - Congressional House Staff Plan 3, Core Constituencies		Inadequately identified; Authenticity; Foundation
254	Ex. 6 - E-mail From Dennis Thacker re: Richland County Redistricting, Dated December 27, 2021	SC HOUSE 0091484	Hearsay; Relevance
255	Ex. 7 - E-mail From Dennis Thacker re: Richland County Redistricting [sic], Dated January 17, 2022	SC HOUSE 0108661	Hearsay; Relevance
256	Ex. 8 - Map Entitled S. 865 Passed, As Signed By Governor		Inadequately identified; Authenticity; Foundation
257	Ex. 9 - Congressional Senate Amendment 1, Population Summary Dated January 27, 2022		Inadequately identified; Authenticity; Foundation
258	Ex. 10 - Congressional Senate Amendment 1, Voting Age Population Summary Dated January 27, 2022		Inadequately identified; Authenticity; Foundation
	Ex. 11 - Congressional Senate Amendment 1 Core Constituencies		Inadequately identified; Authenticity; Foundation

Exhibit #	Description	Bates Number (if applicable)	Objection
259	Ex. 12 - Map Entitled Congressional House Staff Plan Alternative 1		Inadequately identified; Authenticity; Foundation
260	Ex. 13 - E-mail from Devon Owens re: Letter to House Speaker J. Lucas, Dated January 26, 2022	SC HOUSE 0109234- SC HOUSE 0109237	Relevance; Hearsay
261	Ex. 14 - E-mail from Julia Foster re: Rules Committee Meeting Wednesday, January 22, 2022, at 1 PM in Rm 305, Blatt Building, Dated January 11, 2022	SC HOUSE 0111632- SC HOUSE 0111635	
262	Ex. 15 - Text Message Chain, Dated February 12 at 9:18AM	SC HOUSE 0110878	Relevance; Foundation; Hearsay; Privileged
263	Ex. 16 - Text Message Chain Produced by Chairman Chris Murphy	SC HOUSE 0110887- SC HOUSE 0110889	Inadequately identified; Hearsay; Foundation; Relevance; Harassment
264	Deposition of Will Roberts July 7, 2022		Relevance; Confusion; Hearsay; Cumulative
265	Ex. 1 - For Columbia's Hard To Count Census Area, New Methods Won't Solve Access Issues		Relevance; Hearsay
266	Ex. 2 - Bad File - Doesn't Open - The Impact of The 2020 Census to South Carolina		Relevance; Hearsay
267	Ex. 3 - Handwritten Notes - Redistricting Staff Meeting	SCSENATE 00025199	Foundation; Relevance; Hearsay
268	Ex. 4 - 2001 Redistricting Guidelines	SCSENATE 00003721- SCSENATE 00003722	Cumulative
269	Ex. 5 - Email Re: Talking Points and Cheat Sheets and Attachments	SCSENATE 00021732- SCSENATE 00021745	Foundation; Relevance; Hearsay
270	Ex. 6 - Terreni - Oldham Text Messages	SCSENATE_00004343- SCSENATE_00004352	Foundation; Relevance; Hearsay
271	Ex. 7 - Email Re: Meeting Minutes and Attachment	SCSENATE 00024941- SCSENATE 00024942	Foundation; Relevance; Hearsay
272	Ex. 8 - Email Chain Re: Proposed Congressional and Senate Maps Submissions and Attachments	SCSENATE 00003798- SCSENATE 00003834	Foundation; Relevance; Hearsay
273	Ex. 9 - Email Chain Re: Proposed Congressional and Senate Maps Submissions	SCSENATE 00024956	Foundation; Relevance;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Hearsay
274	Ex. 10 - Email Chain Re: LWVSC Senate and Congressional Maps	SCSENATE_00003749- SCSENATE_00003751	Foundation; Relevance; Hearsay
275	Ex. 11 - LWVSC Electronic Submission	SCSENATE_00003750- SCSENATE_00003751	Foundation; Relevance; Hearsay
276	Ex. 12 - SABB Least Change Plan		Foundation; Relevance; Hearsay; Authenticity
277	Ex. 13 - South Carolina Congressional Districts		Foundation; Relevance; Hearsay; Authenticity
278	Ex. 14 - 11/29/2021 Video Transcription		Foundation; Relevance; Hearsay; Authenticity
279	Ex. 15 - 11/29/2021 Joint Testimony	SCSENATE 00003851- SCSENATE 00003855	Foundation; Relevance; Hearsay
280	Ex. 16 - Email Chain Re: Item Shared With You: "A and B.Zip"	SCSENATE 00003244	Foundation; Relevance; Hearsay; Cumulative
281	Ex. 17 - Email Chain Re: Item Shared With You: "Jessamine.Zip"	SCSENATE 00003245	Foundation; Relevance; Hearsay; Cumulative
282	Ex. 18 - Email Chain Re: Item Shared With You: "Jessamine.Zip"	SCSENATE 00003246	Foundation; Relevance; Hearsay; Cumulative
283	Ex. 19 - Email Chain Re: Charleston and Daniel Island Plan Comparison	SCSENATE 00022549	Foundation; Relevance; Hearsay; Cumulative
284	Ex. 20 - Senate Judiciary Committee Press Release		Foundation; Relevance; Hearsay; Inadequately identified
285	Ex. 21 - 1/13/2022 Video Transcription		Foundation; Relevance; Hearsay;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Authenticity; Inadequately identified
286	Ex. 22 - Written Testimony Offered to the Redistricting Subcommittee	SCSENATE_00003252- SCSENATE_00003259	Foundation; Relevance; Hearsay
287	Ex. 23 - List of Written Testimony Received After Announcement of Meeting, January 11, 2022		Foundation; Relevance; Hearsay; Inadequately identified
288	Ex. 24 - Email Re: Analysis For Sen. Campsen and Attachment	SCSENATE 00022528- SCSENATE 00022530	Foundation; Relevance; Hearsay
289	Ex. 25 - Email Re: House Questions Distilled and Clarified and Attachment	SCSENATE 00022295- SCSENATE 00022297	Foundation; Relevance; Hearsay
290	Ex. 26 - Roberts Text Message Exchange	SCSENATE 00025281	Foundation; Relevance; Hearsay
291	Ex. 27 - 7 Member Republican Plan Stats	SCSENATE 00025791	Foundation; Relevance; Hearsay; Cumulative
292	Ex. 28 - 7 MEMBER 240 Republican Plan 2 Stats	SCSENATE 00025798	Foundation; Relevance; Hearsay; Cumulative
293	Ex. 29 - Image File	SCSENATE 00026828	Foundation; Relevance; Hearsay; Cumulative
294	Ex. 30 - Sabb Charleston Beaufort Whole	SCSENATE 00025926	Foundation; Relevance; Hearsay; Cumulative
295	Ex. 31 - South Carolina Congressional Districts	SCSENATE 00026370	Foundation; Relevance; Hearsay; Cumulative
296	Ex. 32 - Richland Charleston Whole Plan	SCSENATE 00026485	Foundation; Relevance; Hearsay; Cumulative
297	Ex. 33 - January 10, 2022 Analysis of Sabb Least Change Plan	SCSENATE 00026554	Foundation; Relevance; Hearsay;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Cumulative
298	Ex. 34 - Image File	SCSENATE 00026559	Foundation; Relevance; Hearsay; Cumulative
299	Ex. 35 - Third Amended Complaint for Injunctive and Declaratory Relief		Relevance; Hearsay
300	Deposition of Paula Benson July 13, 2022		Relevance; Hearsay
301	Ex. 1 - Red Book		Foundation; Relevance; Hearsay
302	Ex. 2 - Tab 10 w/Enclosures	SCSENATE 00024916- SCSENATE 00024930	Foundation; Relevance; Hearsay; Inadequately Identified
303	Ex. 3 - Tab 51 Guidelines	SCSENATE 00003721- SCSENATE 00003722	Cumulative
304	Ex. 4 - Tab 13	SCSENATE 00022979- SCSENATE 00022984	Foundation; Relevance; Hearsay; Inadequately Identified; Cumulative
305	Ex. 5 - Tab 15	SCSENATE 00022975- SCSENATE 00022978	Foundation; Relevance; Hearsay; Inadequately Identified
306	Ex. 6 - Tab 14	SCSENATE 00024352- SCSENATE 00024523	Foundation; Relevance; Hearsay; Inadequately Identified
307	Ex. 7 - Tab 23	SCSENATE 00022619- SCSENATE 00022621	Foundation; Relevance; Hearsay; Inadequately Identified
308	Ex. 8 - Tab 2 Hearing Trans.		Foundation; Relevance; Hearsay; Inadequately Identified

Exhibit #	Description	Bates Number (if applicable)	Objection
309	Ex. 9 - Public Submission Pol.		Foundation; Relevance; Hearsay; Inadequately Identified; Cumulative
310	Ex. 10 - Tab 33	SCSENATE 00023168- SCSENATE 00023171	Foundation; Relevance; Hearsay; Inadequately Identified
311	Ex. 11 - Tab 38	SCSENATE 00022699- SCSENATE 00022703	Foundation; Relevance; Hearsay; Inadequately Identified
312	Ex. 12 - Tab 32	SCSENATE 00022745- SCSENATE 00022746	Foundation; Relevance; Hearsay; Inadequately Identified
313	Ex. 13 - Tab 5		Foundation; Relevance; Hearsay; Inadequately Identified
314	Deposition of Andrew Fiffick July 21, 2022		Relevance; Hearsay
315	Ex. 1 - 2021 Redistricting Guidelines, South Carolina Senate Judiciary Committee Redistricting Subcommittee, Adopted September 17, 2021	SCSENATE_00003721- SCSENATE_00003722	Cumulative
316	Ex. 2 - Email from Paula Benson to Summer Huechtker copying Andy Fiffick and Michelle McGee, dated August 9, 2021	SCSENATE_00003742- SCSENATE_00003746	Foundation; Relevance; Hearsay
317	Ex. 3 - Email chain between Curtis Askew and Senate Redistricting, dated December 3 and 6, 2021	SCSENATE_00000777- SCSENATE_00000779	Foundation; Relevance; Hearsay
318	Ex. 4 - Email from Paula Benson to Andy Fiffick, Charles Terreni, Will Roberts, and John Breeden, dated November 2, 2021	SCSENATE_00022619- SCSENATE_00022621	Foundation; Relevance; Hearsay; Cumulative
319	Ex. 5 - Messages exported from iPhone with Dalton Oldham	SCSENATE_00004343- SCSENATE_00004352	Foundation; Relevance; Hearsay; Cumulative
320	Ex. 6 - Email chain between Breeden John and Curtis Askew	SCSENATE_00003278- SCSENATE_00003280	Foundation; Relevance;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Hearsay
321	Ex. 7 - Email from Breeden John to <u>osedwick@elias.law</u> , dated December 9, 2021	SCSENATE_00003372	Foundation; Relevance; Hearsay
322	Ex. 8 - Email chain between Holli Miller, Michelle McGee, Luke Rankin, George E. "Chip" Campsen III, Tom Young, Ronnie Sabb, Margie Bright Matthews, Scott Talley, and Dick Harpootlian, dated July 14, 2021 and September 16, 2021	SCSENATE_00003387- SCSENATE_00003395	Foundation; Relevance; Hearsay; Cumulative
323	Ex. 9 - 2021 Policy Public Plan Submissions, South Carolina Senate Judiciary Committee Redistricting Subcommittee, adopted September 17, 2021	SCSENATE_00003723- SCSENATE_00003724	Cumulative
324	Ex. 10 - Email from Adam Kincaid to Andrew Fiffick, dated November 18, 2021	SCSENATE_00003244	Cumulative
325	Ex. 11 - Email from Andrew Kincaid to Andrew Fiffick, dated November 24, 2021	SCSENATE_00003245	Cumulative
326	Ex. 12 - Email from Adam Kincaid to Andrew Fiffick, dated November 28, 2021	SCSENATE_00003246	Cumulative
327	Ex. 13 - Email from Chip Campsen to Breeden John dated, January 11, 2022	SCSENATE_00022549	Foundation; Relevance; Hearsay; Cumulative
328	Ex. 14 - Transcription of the January 13th, 2022, Senate Judiciary Hearing	SCNAACP_CD_011935- SCNAACP_CD_012054	Foundation; Relevance; Hearsay; Cumulative; Authenticity
329	Ex. 15 - Email from Will Roberts to Robert Joseph Oppermann, dated January 18, 2022	SCSENATE_00003260- SCSENATE_00003265	Foundation; Relevance; Hearsay; Cumulative; Rule 702
330	Ex. 16 - Email to Andy Fiffick from Robert Joseph Oppermann, dated January 17, 2022	SCSENATE_00003269- SCSENATE_00003277	Foundation; Relevance; Hearsay; Cumulative; Rule 702
331	Ex. 17 - List of written testimony received after announcement of meeting, January 11, 2022	SCSENATE_00023933- SCSENATE_00024040	Foundation; Relevance; Hearsay; Cumulative
332	Ex. 18 - Email from Will Roberts to Andy Fiffick, dated January 16, 2022	SCSENATE_00022528- SCSENATE_00022530	Foundation; Relevance; Hearsay; Cumulative

Exhibit #	Description	Bates Number (if applicable)	Objection
333	Ex. 19 - From Andy Fiffick to Andy Fiffick, dated January 18, 2022	SCSENATE_00022509	Foundation; Relevance; Hearsay; Cumulative
334	Ex. 20 - January 18, 2022 Email from B. John to W. Roberts with attachment	SCSENATE_00022353- SCSENATE_00022355	Foundation; Relevance; Hearsay; Cumulative
335	Ex. 21 - Email from Andy Fiffick to Luke Rankin, dated January 18, 2022	SCSENATE_00022286- SCSENATE_00022288	Foundation; Relevance; Hearsay; Cumulative
336	Ex. 22 - 7 Member Republican Plan, 7 Member Republican Plan 2, and Max Republican 1st	SCSENATE_00025791, SCSENATE_00025798, SCSENATE_00026828, and SCSENATE_00026688	Foundation; Relevance; Hearsay
337	Ex. 23 - Sabb Charleston Beaufort Whole Stats	SCSENATE_00025926, SCSENATE_00025929, and SCSENATE_00025930	Foundation; Relevance; Hearsay
338	Ex. 24 - South Carolina Congressional Districts, Palmetto Plan	SCSENATE_00026370- SCSENATE_00026371	Foundation; Relevance; Hearsay
339	Ex. 25 - Wren Plan	SCSENATE_00026635	Foundation; Relevance; Hearsay
340	Ex. 26 - Richland Charleston Whole Data	SCSENATE_00026485	Foundation; Relevance; Hearsay
341	Ex. 27 - Sabb Charleston Strong Data (Not Marked)	SCSENATE 00026522	Foundation; Relevance; Hearsay
342	Ex. 28 - Sabb Charleston Strong Data (Marked)	SCSENATE 00026522	Foundation; Relevance; Hearsay
343	Ex. 29 - January 10, 2022 Analysis of Sabb Least Change Plan	SCSENATE_00026554, SCSENATE_00026559	Foundation; Relevance; Hearsay
344	Ex. 30 - Striped Bass	SCSENATE_00026602	Foundation; Relevance; Hearsay
345	Ex. 31 - South Carolina Congressional Districts, Berkeley and Charleston in 1st	SCSENATE_00026689	Foundation; Relevance; Hearsay
346	Ex. 32 - South Carolina Congressional Districts, MBM Plan	SCSENATE_00026696, 00026745	Foundation; Relevance;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Hearsay
347	Ex. 33 - House Plan 2 Senate Amendment 2 Blk Eq	SCSENATE_00026890	Foundation; Relevance; Hearsay
348	Ex. 34 - Sabb Charleston Whole 7 Core	SCSENATE_00027036	Foundation; Relevance; Hearsay
349	Deposition of Sean Trende July 21, 2022		Relevance; Confusion; Hearsay; Cumulative
350	Ex. 1 - Deposition notice		Relevance; Hearsay; Cumulative
351	Ex. 4 - Curriculum Vitae		Relevance; Confusion
352	Ex. 5 - Updated Curriculum Vitae		Relevance; Confusion
353	Ex. 6 - Series of Invoice Receipts	SCSENATE_00027324- SCSENATE_00027329	Relevance; Hearsay
354	Ex. 7 - Congressional House Staff Map		Cumulative
355	Ex. 8 - 2021 Guidelines for South Carolina Redistricting		Cumulative
356	Ex. 9 - House constituency Core Analysis		Cumulative
357	Ex. 10 - Senate Constituency Core Analysis		Cumulative
358	Ex. 11 - Backus decision		Hearsay; Cumulative
359	Ex. 12 - Population Summary		Cumulative
360	Ex. 13 - County Borders		Cumulative
361	Ex. 14 - House District Report And Staff Plan		Cumulative
362	Ex. 15 - House Redistricting Report		Cumulative
363	Ex. 16 - Email	SCSENATE_00003244	Foundation; Relevance; Hearsay; Cumulative
364	Ex. 17 - Email dated November 24, 2021	SCSENATE_00003245	Foundation; Relevance; Hearsay; Cumulative
365	Deposition of Wallace Jordan - Vol. 2 July 21, 2022		Relevance; Confusion; Hearsay; Cumulative
366	Ex. 1 - Transcript of the 238 Videoconference Deposition of Wallace H. Jordan held on Wednesday, April 13, 2022		Relevance; Confusion; Hearsay; Inadequately

Exhibit #	Description	Bates Number (if applicable)	Objection
			identified
367	Ex. 2 - House Defendants 241 James H. Lucas, Chris Murphy, and Wallace H. Jordan's Responses to Plaintiffs' First Requests For Production of Documents Regarding the Congressional Plan		
368	Ex. 3 - House Defendants 242 James H. Lucas, Chris Murphy, and Wallace H. Jordan's Answers to Plaintiffs' First Set of Interrogatories Regarding the Congressional Plan		
369	Ex. 4 - Composite of text 258 messages	SC HOUSE 0112579- SC HOUSE 0112586	Relevance; Confusion; Hearsay
370	Ex. 5 - Emails between Jay 267 Jordan and Doug Gilliam dated December 17, 2021	SC HOUSE 0108658	
371	Ex. 6 - E-mail dated 3/1/21 273 from Thomas Hauger to Emma Dean and others; Subject: Welcome to the SC House Redistricting	SC HOUSE 0102028- SC HOUSE 0102029	Relevance; Foundation; Hearsay; Cumulative
372	Ex. 7 - Composite - 291 Redistricting Documents	SC HOUSE 0112187- SC HOUSE 0112274	Inadequately identified; Relevance
373	Ex. 8 - 2021 Redistricting 317 Map Room Policies and Procedures	SC HOUSE 0106831- SC HOUSE 0106832	Cumulative
374	Ex. 9 - Video Transcription 323 of November 10, 2021 SC House Judiciary Ad-Hoc Committee Redistricting Hearings		Relevance; Hearsay; Inadequately identified
375	Ex. 10 - Congressional 338 House Staff Plan		Inadequately identified; Foundation; Hearsay; Authenticity
376	Ex. 11 - Video 351 Transcription of December 16, 2021 House Judiciary Committee	SC HOUSE 0112131- SC HOUSE 0112185	Relevance; Hearsay
377	Ex. 12 - Congressional 355 House Staff Plan Alternative 1		Inadequately identified; Foundation; Hearsay; Authenticity
378	Ex. 13 - Video 377 Transcription of the December 29, 2021 House Judiciary Committee	SC HOUSE 0112084- SC HOUSE 0112130	Relevance; Hearsay
379	Ex. 14 - Video 381 Transcription of the January 10, 2022 House Judiciary Committee		Relevance; Hearsay; Foundation; Authenticity

Exhibit #	Description	Bates Number (if applicable)	Objection
380	Ex. 15 - Transcription of 391 the January 10, 2022 House Judiciary Committee		Relevance; Hearsay; Foundation; Authenticity
381	Ex. 16 - Video 404 transcription of January 12, 2022 House proceedings		Relevance; Hearsay; Foundation; Authenticity
382	Deposition of Neal Collins Transcript July 28, 2022		Relevance; Confusion; Hearsay
383	Ex. 1 - Notice of 10 Deposition		Relevance; Confusion; Hearsay
384	Ex. 2 - House Districting 47 Guidelines		Relevance; Cumulative; Inadequately identified; Foundation; Authenticity
385	Ex. 4 - 2021 Redistricting 61	SC_HOUSE_0106831- SC_HOUSE_0106832	Cumulative; Inadequately identified
386	Ex. 5 - Email	SC_HOUSE_0101470	
387	Ex. 6 - Text Message	SC_HOUSE_0110877	
388	Ex. 7 - Email	SC_HOUSE_0108644	
389	Ex. 8 - NCSL - Redistricting and the Supreme Court: The Most Significant Cases	SC_HOUSE_0108646- SC_HOUSE_0108653	
390	Ex. 9 - South Carolina 81 Congressional Districts Map		Cumulative; Inadequately identified; Foundation; Authenticity
391	Ex. 10 - Congressional 88 House Staff Plan Map		Cumulative; Inadequately identified; Foundation; Authenticity
392	Ex. 11 - Email	SC_HOUSE_0111575	
393	Ex. 12 - Email	SC_HOUSE-0111948	Inadequately identified; Relevance; Foundation
394	Ex. 13 - Text Message	SC_HOUSE_0112589	
395	Ex. 14 - Text Message	SC_HOUSE_0112590	Hearsay; Inadequately identified

Exhibit #	Description	Bates Number (if applicable)	Objection
396	Ex. 15 - Text Message	SC_HOUSE_0112587	Inadequately identified; Hearsay; Relevance
397	Ex. 16 - Text Message	SC_HOUSE_0112588	Cumulative; Hearsay; Inadequately identified
398	Ex. 17 - Congressional 113 House Staff Plan Alternative I		Cumulative; Inadequately identified; Foundation; Authenticity
399	Ex. 18 - Video 126 Transcription December 29, 2021, House Judiciary Committee		Hearsay; Relevance; Inadequately identified; Foundation; Authenticity
400	Ex. 19 - Email	SC_HOUSE_0009032	Inadequately identified; Hearsay; Foundation
401	Ex. 20 - S. 865 Passed - As 128 Signed By the Governor		Cumulative; Inadequately identified; Foundation; Authenticity
402	Ex. 21 - Video 133 Transcription, January 10, 2022, House Judiciary Committee, Redistricting Ad Hoc Committee Meeting		Cumulative; Inadequately identified; Foundation; Authenticity
403	Ex. 22 - Letter	SC_HOUSE_0106699	Inadequately identified; Foundation; Hearsay; Relevance; Cumulative
404	Ex. 23 – Letter	SC_HOUSE_0109224- SC_HOUSE_0109225	Inadequately identified; Foundation; Hearsay; Relevance; Cumulative
405	Ex. 24 - Video 141 Transcription, January 10, 2022, House Judiciary Committee, Full Committee Meeting		Cumulative; Inadequately

Exhibit #	Description	Bates Number (if applicable)	Objection
			identified; Foundation; Authenticity
406	Deposition of Luke Rankin August 2, 2022		Relevance; Hearsay
407	Ex. 1 - 2021 Redistricting Guidelines	SCSENATE_00003721- SCSENATE_00003722	Cumulative
408	Ex. 3 - South Carolina Legislature Hearings Transcription of Audio File 20210917 SJudiciaryRedistrictingSubcommittee 11530_1 Audio Runtime: 1:26:35		Relevance; Hearsay; Authenticity; Inadequately Identified
409	Ex. 4 - Email dated July 20, 2021, with Attachments	SCSENATE 00022975- SCSENATE 00022978	Foundation; Relevance; Hearsay; Cumulative
410	Ex. 5 - Letter dated September 16, 2021 to Honorable Luke A. Rankin, Chair, from Richard A. Harpootlian, with Attachments	SCSENATE 00003576- SCSENATE 00003582	Relevance; Hearsay; Cumulative
411	Ex. 6 - Email Chain dated January 1, 2022, with Attachments	SCSENATE 00022285- SCSENATE 00022288	Relevance; Hearsay; Cumulative
412	Deposition of Shane Massey August 2, 2022		Relevance; Confusion; Hearsay; Cumulative
413	Ex. 1 - 2021 Redistricting Guidelines	SCSENATE_00003721- SCSENATE_00003722	Cumulative
414	Ex. 2 - January 20, 2022 Video Transcription		Relevance; Hearsay; Authenticity; Cumulative
415	Ex. 3 - January 20, 2022 Email Re: Talking Points And Cheat Sheets	SCSENATE_00021732- SCSENATE_00021742	Foundation; Relevance; Hearsay; Cumulative
416	Ex. 4 - January 19, 2022 Transcription Of Proceedings		Relevance; Hearsay; Authenticity
417	Ex. 5 - Email Chain Re: Item Shared With You: "A And B.Zip"	SCSENATE_00003244	Foundation; Relevance; Hearsay; Cumulative
418	Ex. 6 - South Carolina Congressional Districts Staff Subcommittee Plan		Cumulative
419	Ex. 7 - South Carolina Congressional Districts House Plan 2 Senate Amendment 1		Cumulative

Exhibit #	Description	Bates Number (if applicable)	Objection
420	Ex. 8 - November 30, 2021 Email Re: Please Join Zoom Meeting In Progress	SCSENATE_00022760	Foundation; Relevance; Hearsay; Cumulative
421	Deposition of George Campsen August 5, 2022		Relevance; Confusion; Hearsay; Cumulative
422	Ex. 1 - Subpoena		Relevance; Hearsay
423	Ex. 2 - Senator George Campsen's Objections and Responses to Plaintiffs' Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action		Relevance; Hearsay
424	Ex. 3 - Text Messages	SCSENATE 00027301- SCSENATE 00027316	Relevance; Hearsay; Cumulative
425	Ex. 4 - 2021 Policy For Public Plan Submissions, South Carolina Senate Judiciary Committee Redistricting Subcommittee (SCSENATE 00003723 to 3724)	SCSENATE 00003723- SCSENATE 00003724	Cumulative
426	Ex. 5 - Email Exchange Ending on the First Page From Lynn Teague to Paula Benson, Dated September 30, 2021	SCSENATE 00003749- SCSENATE 00003751	Foundation; Relevance; Hearsay; Cumulative
427	Ex. 6 - Email Exchange Ending on the First Page From Lynn Aden to Senate Redistricting, et al., Dated October 8, 2021	SCSENATE 00003798- SCSENATE 00003834	Foundation; Relevance; Hearsay; Cumulative
428	Ex. 7 - 2021 Redistricting Guidelines, South Carolina Senate Judiciary Committee, Redistricting Subcommittee	SCSENATE 00003721- SCSENATE 00003722	Cumulative
429	Ex. 8 - July 20th of 2021 Hearing Transcript	SCNAACP_CD_011429- SCNAACP_CD_011429	Relevance; Hearsay; Authenticity
430	Ex. 9 - September 13, 2021, Email From Madison Faulk to Maura Baker with Attachments	SCSENATE 00022919- SCSENATE 00022925	Foundation; Relevance; Hearsay; Cumulative
431	Ex. 10 - November 12th Senate Judiciary Hearing	SCNAACP_CD_011729- SCNAACP_CD_011843	Relevance; Hearsay; Authenticity; Cumulative
432	Ex. 11 - Staff Subcommittee Plan Map		Inadequately Identified; Cumulative
433	Ex. 12 - November 29th, 2021, Hearing Transcript	SCNAACP_CD_011844- SCNAACP_CD_011934	Relevance; Hearsay;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Authenticity; Cumulative
434	Ex. 13 - January 5, 2022, Email from W. Roberts to C. Campsen with attachments	SCSENATE 00022581- SCSENATE 00022584	Relevance; Hearsay; Cumulative
435	Ex. 14 - Text Messages	SCSENATE 00027173- SCSENATE 00027174	Relevance; Hearsay; Cumulative
436	Ex. 15 - Email Exchange Ending on the First Page From Breeden John to Chip Campsen, et al., Dated October 8, 2021, with Attachment	SCSENATE 00022547- SCSENATE 00022549	Relevance; Hearsay; Cumulative; Incomplete
437	Ex. 16 - January 11, 2022, Email From Breeden John to Chip Campsen, et al., with Attachment	SCSENATE 00022561- SCSENATE 00022564	Relevance; Hearsay; Cumulative; Incomplete
438	Ex. 17 - January 11, 2022, Email From Michelle McGee to Luke Rankin, et al.	SCSENATE 00022556- SCSENATE 00022557	Foundation; Relevance; Hearsay; Cumulative
439	Ex. 18 - January 13, 2022, Hearing Transcript	SCNAACP_CD_011935- SCNAACP_CD_012054	Relevance; Hearsay; Authenticity; Cumulative
440	Ex. 19 - January 17, 2022, Email From Robert Oppermann to Andy Fiffick with Attachment	SCSENATE_00003269- SCSENATE_00003277	Foundation; Relevance; Hearsay; Cumulative; Rule 702
441	Ex. 20 - List of Written Testimony Received After Announcement of Meeting, January 11, 2022	SCSENATE_00023933- SCSENATE_00024040	Foundation; Relevance; Hearsay; Cumulative
442	Ex. 21 - January 16, 2022, Email From Will Roberts to Andy Fiffick with Attachment	SCSENATE 00022528- SCSENATE 00022530	Foundation; Relevance; Hearsay; Cumulative
443	Ex. 22 - January 17, 2022, Email From Breeden John to Chip Campsen, et al., Zoom Invite	SCSENATE 00022510	Foundation; Relevance; Hearsay; Cumulative
444	Ex. 23 - January 18, 2022, Email From Paula Benson to Chip Campsen, et al., with Attachment	SCSENATE 00022356- SCSENATE 00022364	Foundation; Relevance; Hearsay; Cumulative
445	Ex. 24 - January 18, 2022, Email From Luke Rankin to Andy Fiffick with Attachment	SCSENATE 00022289- SCSENATE 00022291	Foundation; Relevance;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Hearsay; Cumulative
446	Ex. 25 - January 19, 2022, Hearing Transcript	SCNAACP_CD_013197- SCNAACP_CD_013264	Relevance; Hearsay; Authenticity; Cumulative
447	Ex. 26 - January 20, 2022, Hearing Transcript		Relevance; Hearsay; Authenticity; Cumulative; Inadequately Identified
448	Deposition of Breeden John August 9, 2022		Relevance; Hearsay
449	Ex. 1 - Certification Under Penalty of Perjury		Relevance; Hearsay
450	Ex. 2 - Meeting Notes	SCSENATE_00025199	Foundation; Relevance; Hearsay
451	Ex. 3 - 2021 Policy For Public Class Submissions	SCSENATE_00003723	Cumulative
452	Ex. 4 - Email from Lynn Teague to Paula Benson	SCSENATE_00003749- SCSENATE_00003751	Foundation; Relevance; Hearsay; Cumulative
453	Ex. 5 - Email from Leah Aden	SCSENATE_00003798- SCSENATE_00003834	Foundation; Relevance; Hearsay; Cumulative
454	Ex. 6 - Email	SCSENATE 00022959- SCSENATE 00022960	Foundation; Relevance; Hearsay; Cumulative
455	Ex. 7 - Email from Ms. Benson to Breeden John	SCSENATE 00022745- SCSENATE 00022746	Foundation; Relevance; Hearsay; Cumulative
456	Ex. 8 - Senate Redistricting Criteria	SCSENATE_00003721- SCSENATE_00003722	Cumulative
457	Ex. 9 - Transcript of Subcommittee Hearing	SCNAACP_CD_011429- SCNAACP_CD_011485	Relevance; Hearsay; Authenticity; Cumulative
458	Ex. 10 - Transcript of September 7, 2021 Hearing	SCSENATE_00003484- SCSENATE_00003571	Relevance; Hearsay
459	Ex. 11 - Emails with attachment	SCSENATE 00003372	Foundation; Relevance; Hearsay;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Cumulative
460	Ex. 12 - Email between Breeden John and Dr. Ruoff	SCSENATE 00025111	Relevance; Hearsay; Incomplete
461	Ex. 13 - Email	SCSENATE 00025114	Relevance; Hearsay; Incomplete
462	Ex. 14 - Revised Senate Redistricting 2021 Public Hearing Schedule	SCSENATE 00003403- SCSENATE 00003404	Relevance; Hearsay; Cumulative
463	Ex. 15 - Email from Madison Faulk to Maura Baker	SCSENATE 00022919- SCSENATE 00022925	Foundation; Relevance; Hearsay; Cumulative
464	Ex. 16 - Email with attachments	SCSENATE 00025136	Relevance; Hearsay
465	Ex. 17 - Transcript of November 12, 2021 Hearing	SCNAACP_CD_011729- SCNAACP_CD_011843	Relevance; Hearsay; Authenticity; Cumulative
466	Ex. 18 - 2021 Staff State Congressional Plan		Inadequately Identified; Cumulative
467	Ex. 19 - Map	SCSENATE_00003245	Foundation; Relevance; Hearsay
468	Ex. 20 - Transcript of Hearing	SCNAACP_CD_011844- SCNAACP_CD_011934	Relevance; Hearsay; Authenticity; Inadequately Identified
469	Ex. 21 - Email exchange from Breeden John and Senator Campsen with attachment	SCSENATE 00022547- SCSENATE 00022549	Relevance; Hearsay; Incomplete
470	Ex. 22 - Lists of Written Testimony Received After Announcement of Meeting January 11, 2022	SCSENATE 00023933- SCSENATE 00024040	Cumulative
471	Ex. 23 - Analysis for Senator Campsen with attachment	SCSENATE 00022528- SCSENATE 00022530	Relevance; Hearsay; Incomplete
472	Ex. 24 - Zoom Invite	SCSENATE 00022526	Relevance; Hearsay
473	Ex. 25 - Zoom Invite	SCSENATE 00022369	Relevance; Hearsay
474	Ex. 26 - Email from Breeden John to Mr. Fiffick, et al	SCSENATE 00021732- SCSENATE 00021742	Relevance; Hearsay

Exhibit #	Description	Bates Number (if applicable)	Objection
475	Ex. 27 - Emails	SCSENATE 00022677- SCSENATE 00022680	Relevance; Hearsay; Cumulative
476	Ex. 28 - Map	SCSENATE 00025926- SCSENATE 00025930	Relevance; Hearsay; Cumulative
477	Ex. 29 - January 10, 2022 Analysis of Sabb Least Change Plan	SCSENATE 00026554, SCSENATE 00026559	Relevance; Hearsay; Cumulative
478	Ex. 30 - Map	SCSENATE 00026696	Relevance; Hearsay; Cumulative
479	Deposition of Adam Kincaid August 10, 2022		Relevance; Hearsay
480	Ex. 1 - Subpoena of Mr. Adam Kincaid		Relevance; Hearsay
481	Ex. 2 - Subpoena of The National Republican Redistricting Trust		Relevance; Hearsay
482	Ex. 3 - Subpoena of The National Republican Redistricting Trust of Produce Document		Relevance; Hearsay
483	Ex. 4 - Wren Map		Cumulative
484	Ex. 5 - Palmetto Map		Cumulative
485	Ex. 6 - Jessamine Map		
486	Ex. 7 - November 23, 2021 Senate Map		Cumulative
487	Ex. 8 - Congressional House Staff Plan Map		Cumulative
488	Ex. 9 - Congressional House Staff Plan Alternative 1 Map		Cumulative
489	Ex. 10 - S. 865 Passed - As Signed by the Governor Map		Cumulative
490	Ex. 11 - Transcription of Video File Judiciary Redistricting Subcommittee, November 29, 2021		Inadequately Identified; Hearsay; Authenticity; Relevance
491	Ex. 12 - Email correspondence	SCSENATE_00003245	Relevance; Hearsay; Cumulative
492	Ex. 13 - Email correspondence	SCSENATE_00003246	Relevance; Hearsay; Cumulative
493	Ex. 14 - Email correspondence	SCSENATE_00027169	Relevance; Hearsay; Cumulative
494	Ex. 15 - Email correspondence	SCSENATE_00003244	Relevance; Hearsay; Cumulative
495	Deposition of Beth Bernstein August 10, 2022		Relevance; Confusion; Hearsay

Exhibit #	Description	Bates Number (if applicable)	Objection
496	Ex. 1 - Notice of Deposition		Relevance; Confusion; Hearsay
497	Ex. 2 - South Carolina House of Representatives Judiciary Committee Redistricting Ad Hoc Committee 2021 Guidelines and Criteria For Congressional and Legislative Redistricting		Relevance; Cumulative; Inadequately identified; Foundation; Authenticity
498	Ex. 3 - Redistricting Map Room Policies and Procedures	SC HOUSE 0007887- SC HOUSE 0007888	Cumulative
499	Ex. 4 - Senate Map		Cumulative; Inadequately identified; Foundation; Authenticity
500	Ex. 5 - First House Congressional plan		Cumulative; Inadequately identified; Foundation; Authenticity
501	Ex. 6 - House Congressional Alternative Draft Plan		Cumulative; Inadequately identified; Foundation; Authenticity
502	Ex. 7 - Redistricting Ad Hoc Subcommittee Transcript, December 29, 2021		Cumulative; Inadequately identified; Foundation; Authenticity
503	Ex. 8 - Video transcription House Judiciary Committee Redistricting Ad Hoc Committee Meeting, January 10, 2022		Cumulative; Inadequately identified; Foundation; Authenticity
504	Ex. 9 - Video transcription of the House Judiciary Committee Meeting January 10, 2022		Cumulative; Inadequately identified; Foundation; Authenticity
505	Ex. 10 - House Plan 2, Senate Amendment 2		Cumulative; Inadequately identified; Foundation; Authenticity
506	Ex. 11 - Map		Cumulative;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Inadequately identified; Foundation; Authenticity
507	Deposition of Justin Bamberg August 11, 2022		Relevance; Confusion; Hearsay
508	Ex. 2 - South Carolina House of Representatives Judiciary Committee Redistricting Ad Hoc Committee 2021 Guidelines and Criteria for Congressional and Legislative Redistricting		Cumulative; Inadequately identified; Foundation; Authenticity
509	Ex. 3 - South Carolina Congressional Districts Staff Subcommittee Plan		Cumulative; Inadequately identified; Foundation; Authenticity
510	Ex. 4 - Congressional House Staff Map		Cumulative; Inadequately identified; Foundation; Authenticity
511	Ex. 5 - Congressional House Staff Plan Alternative 1		Cumulative; Inadequately identified; Foundation; Authenticity
512	Ex. 6 - House Judiciary Committee Video Transcript, dated December 29, 2021		Relevance; Cumulative; Inadequately identified; Foundation; Authenticity
513	Ex. 7 - S. 865 Passed - As Signed by the Governor Map		Cumulative; Inadequately identified; Foundation; Authenticity
514	Deposition of Charles Terrini August 16, 2022		Relevance; Hearsay
	Ex. 1 - Text exchange	SCSENATE_00004343- SCSENATE_00004352	Relevance; Hearsay; Cumulative
515	Ex. 2 - Communication between Mr. Fiffick and Mr. Kincaid	SCSENATE_00003244	Foundation; Relevance; Hearsay; Cumulative

Exhibit #	Description	Bates Number (if applicable)	Objection
516	Ex. 3 - Wren plan	SCSENATE 00026635	Cumulative
517	Ex. 4 - Map	SCSENATE 00026370	Cumulative
518	Ex. 5 - Email from Adam Kincaid to Mr. Fiffick	SCSENATE_00003245	Foundation; Relevance; Hearsay; Cumulative
519	Ex. 6 - Email between Adam Kincaid and Mr. Fiffick	SCSENATE 00003246	Foundation; Relevance; Hearsay; Cumulative
520	Ex. 7 - 2021 Policy For Public Plan Submission South Carolina Senate Judiciary Committee Redistricting Committee	SCSENATE 00003723- SCSENATE 00003724	Cumulative
521	Ex. 8 - Charles Terreni Representation Letter	SCSENATE_00004353- SCSENATE_00004354	Relevance; Hearsay
522	Ex. 9 - January 18, 2022 Email from P. Benson to C. Campsen with attachments	SCSENATE 00022356- SCSENATE 00022364	Relevance; Hearsay
523	Ex. 10 - South Carolina Senate Redistricting Subcommittee 2021 Public Hearings	SCSENATE_00003745- SCSENATE_00003746	Relevance; Hearsay; Cumulative
524	Ex. 11 - Subpoena		Relevance; Hearsay
525	Ex. 12 - Email from Paula Benson to Charles Terreni with attachment	SCSENATE 00022619- SCSENATE 00022621	Relevance; Hearsay; Cumulative
526	Ex. 13 - Transcript from 9/17/2021 Senate Judiciary Committee	SCSENATE_00003484- SCSENATE_00003571	Relevance; Hearsay; Cumulative
527	Ex. 14 - Email from Leah Aden to the Senate Redistricting Subcommittee	SCSENATE 00003798- SCSENATE 00003834	Relevance; Hearsay; Cumulative
528	Ex. 15 - Transcript of the Senate redistricting hearing	SCNAACP_CD_011729- SCNAACP_CD_011843	Relevance; Hearsay; Authenticity
529	Ex. 16 - Email chain	SCSENATE 00003372- SCSENATE 00003380	Relevance; Hearsay; Cumulative
530	Ex. 17 - Email cover from Holli Miller	SCSENATE_00003387- SCSENATE_00003395	Relevance; Hearsay; Cumulative
531	Ex. 18 - Transcript of November 29, 2021 Hearing	SCNAACP_CD_011844- SCNAACP_CD_011934	Relevance; Hearsay; Authenticity
532	Ex. 19 - Email from John Breeden to Chip Campsen	SCSENATE 00022547- SCSENATE 00022549	Foundation; Relevance; Hearsay; Cumulative

Exhibit #	Description	Bates Number (if applicable)	Objection
533	Ex. 20 - Transcription of January 13, 2022 Senate Judiciary Hearing	SCNAACP_CD_011935- SCNAACP_CD_012054	Relevance; Hearsay; Authenticity
534	Ex. 21 - Analysis of House Plan 2, Senate Amendment 2A	SCSENATE_00003260- SCSENATE_00003268	Foundation; Relevance; Hearsay
535	Ex. 22 - January 18, 2022 Email from A. Fiffick to L. Rankin with attachment	SCSENATE 00022344- SCSENATE 00022352	Foundation; Relevance; Hearsay
536	Ex. 23 - Email from Will Roberts to Mr. Opperman	SCSENATE 00022528- SCSENATE 00022530	Foundation; Relevance; Hearsay
537	Ex. 24 - Email from Will Roberts to Andy Fiffick	SCSENATE 00021732- SCSENATE 00021745	Foundation; Relevance; Hearsay
538	Ex. 25 - Email from Breeden John to Andy Fiffick, et al, with attachment	SCSENATE 00022286- SCSENATE 00022288	Foundation; Relevance; Hearsay
539	Ex. 26 - Email between Mr. Fiffick, Luke Rankin with attachment	SCSENATE 00022286- SCSENATE 00022288	Foundation; Relevance; Hearsay
540	Public Hearings Transcript-Myrtle Beach (September 8, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
541	Public Hearing Meeting Video- Myrtle Beach (September 8, 2021) https://www.scstatehouse.gov/video/archives.php?key=11506		Relevance; Hearsay; Foundation
542	Public Hearings Transcript-Florence (September 8, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
543	Public Hearing Meeting Video- Florence (September 9, 2021) South Carolina Legislature Video Archives (scstatehouse.gov)		Relevance; Hearsay; Foundation
544	Public Hearings Transcript-York (September 13, 2021)		Inadequately identified; Relevance; Hearsay; Foundation;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Authenticity
545	Public Hearing Meeting Video- York (September 13, 2021) <u>South Carolina Legislature Video Archives(scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
546	Public Hearings Transcript-Greenville (September 14, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
547	Public Hearing Meeting Video- Greenville (September 14, 2021) <u>South Carolina Legislature Video Archives (scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
548	Public Hearings Transcript-North Charleston(September 15, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
549	Public Hearing Meeting Video- North Charleston (September 15, 2021) <u>South Carolina Legislature Video Archives (scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
550	Public Hearings Transcript-Bluffton (September 16, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
551	Public Hearing Meeting Video- Bluffton (September 16, 2021) <u>South Carolina Legislature Video Archives (scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
552	Public Hearings Transcript-Aiken (September 20, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
553	Public Hearing Meeting Video- Aiken (September 16, 2021) <u>South Carolina Legislature Video Archives (scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
554	Public Hearings Transcript-Greenwood (September 21, 2021)		Inadequately identified;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Relevance; Hearsay; Foundation; Authenticity
555	Public Hearing Meeting Video- Greenwood (September 21, 2021) <u>South Carolina Legislature Video Archives</u> (scstatehouse.gov)		Relevance; Hearsay; Foundation
556	Public Hearings Transcript-Orangeburg (September 22, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
557	Public Hearing Meeting Video- Orangeburg (September 21, 2021) <u>South Carolina Legislature Video Archives</u> (scstatehouse.gov)		Relevance; Hearsay; Foundation
558	Public Hearings Transcript-Columbia(September 28, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
559	Public Hearing Meeting Video- Columbia (September 28, 2021) <u>South Carolina Legislature Video Archives</u> (scstatehouse.gov)		Relevance; Hearsay; Foundation
560	Public Hearings Transcript-Columbia(October 4, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
561	Public Hearing Meeting Video- Columbia (October 4, 2021) <u>South Carolina Legislature Video</u> <u>Archives(scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
562	Ad Hoc Committee Hearing Agenda - Columbia (August 3, 2021)		
563	Ad Hoc Committee Hearing Transcript-Columbia (August 3, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity

Exhibit #	Description	Bates Number (if applicable)	Objection
564	Ad Hoc Committee Hearing Video - Columbia (August 3, 2021) <u>South Carolina Legislature Video Archives</u> <u>(scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
565	Ad Hoc Committee Hearing Agenda - Columbia (November 10, 2021)		
566	Ad Hoc Committee Hearing Transcript-Columbia (November 10, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
567	Ad Hoc Committee Hearing Video - Columbia (November 10,2021) <u>South Carolina Legislature Video Archives</u> <u>(scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
568	Ad Hoc Committee Hearing Agenda - Columbia (November 16, 2021)		
569	Ad Hoc Committee Hearing Transcript-Columbia (November 16, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
570	Ad Hoc Committee Hearing Video - Columbia (November 16,2021) <u>South Carolina Legislature Video Archives</u> <u>(scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
571	Ad Hoc Committee Hearing Agenda - Columbia (December 16, 2021)		
572	Ad Hoc Committee Hearing Transcript-Columbia December 16, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
573	Ad Hoc Committee Hearing Video - Columbia (December 16,2021) <u>South Carolina Legislature Video Archives</u> <u>(scstatehouse.gov)</u>		Relevance; Hearsay; Foundation
574	Ad Hoc Committee Hearing Agenda - Columbia (December 29, 2021)		
575	Ad Hoc Committee Hearing Transcript-Columbia December 29 2021)		Inadequately identified; Relevance; Hearsay; Foundation;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Authenticity
576	Ad Hoc Committee Hearing Video - Columbia (December 29, 2021) <u>South Carolina Legislature Video Archives</u> (scstatehouse.gov)		Relevance; Hearsay; Foundation
577	Ad Hoc Committee Hearing Agenda - Columbia (January 10, 2022)		
578	Ad Hoc Committee Hearing Transcript-Columbia (January 10, 2022)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
579	Ad Hoc Committee Hearing Video - Columbia (January 10, 2022) <u>South Carolina Legislature Video Archives</u> (scstatehouse.gov)		Relevance; Hearsay; Foundation
580	Full Judiciary Committee Meeting Agenda (November 16, 2021)		
581	Full Judiciary Committee Meeting Transcript (November 16, 2021)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
582	Full Judiciary Committee Meeting Video (November 16, 2021) <u>South Carolina Legislature Video Archives</u> (scstatehouse.gov)		Relevance; Hearsay; Foundation
583	Full Judiciary Committee Meeting Agenda (January 10, 2022)		
584	Full Judiciary Committee Meeting Transcript (January 10, 2022)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
585	Full Judiciary Committee Meeting Video (January 10, 2022) <u>South Carolina Legislature Video Archives</u> (scstatehouse.gov)		Relevance; Hearsay; Foundation
586	Statewide Map - Young Dems of South Carolina (Erica Sampson)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity

Exhibit #	Description	Bates Number (if applicable)	Objection
587	Statewide Map -Young Dems of South Carolina (Jeni Atchley)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
588	Statewide Map -York County Democratic Party		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
589	Statewide Map -Young Dems of South Carolina (Kevin Eckert)		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
590	Statewide Map -League of Women Voters of SC		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
591	Statewide Map -Michael Roberts		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
592	Statewide Map -NAACP		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
593	2021 S.C. Act No. 117 (H. 4493)		Inadequately identified; Relevance
594	SC NAACP testimonies from House hearings		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
595	SC League of Women Voters proposed House map, <u>House 2021 Redistricting Public Submissions (schouse.gov)</u>		Inadequately identified;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Relevance; Hearsay; Foundation; Authenticity
596	Proposed House maps		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
597	State Election Commission https://www.scvotes.gov/sites/default/files/2021-11-17%20SEC%20Minutes.pdf		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
598	2022 election schedule – appended to House’s MTD		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
599	Committee Agendas, South Carolina House of Representatives Judiciary Committee, https://redistricting.schouse.gov/agendas.html		Inadequately identified; Relevance; Hearsay; Foundation; Authenticity
600	AD-HOC Committee Passed Congressional Map		Inadequately identified; Hearsay; Foundation; Authenticity
601	Congressional House Floor Passed		Inadequately identified; Hearsay; Foundation; Authenticity
602	Full Committee Passed Congressional Map		Inadequately identified; Hearsay; Foundation; Authenticity
603	LWVSC Congressional Submission 1 Map		Inadequately identified; Hearsay; Foundation;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Authenticity
604	Michael Roberts Congressional Map 1 Map		Inadequately identified; Hearsay; Foundation; Authenticity
605	Michael Roberts State House Map 1 Map		Inadequately identified; Hearsay; Foundation; Authenticity
606	NAACP Congressional Submission 1 Map		Inadequately identified; Hearsay; Foundation; Authenticity
607	NAACP Congressional Submission 2 Map		Inadequately identified; Hearsay; Foundation; Authenticity
608	Plan Stats		Inadequately identified; Hearsay; Foundation; Authenticity
609	NRRT - SC_Congress_Palmetto Map		Inadequately identified; Hearsay; Foundation; Authenticity
610	NRRT - SC_Congress_Wren Map		Inadequately identified; Hearsay; Foundation; Authenticity
611	NRRT - SC_Congress_Jessamine Map		Inadequately identified; Hearsay; Foundation; Authenticity
612	NRRT - SC_Congress_SenateStaff Map		Inadequately identified; Hearsay; Foundation; Authenticity

Exhibit #	Description	Bates Number (if applicable)	Objection
613	December 14, 2021 Email from W. Roberts to C. Campsen with attachments	SCSENATE_00027162- SCSENATE_00027329	Relevance; Hearsay; Cumulative
614	August 13, 2021 Email from C. Williams to S. Massey	SCSENATE_00027285	Relevance; Hearsay; Cumulative
615	Letter from C. Williams to S. Massey	SCSENATE_00027286	Relevance; Hearsay; Cumulative
616	February 9, 2022 Email from J. Rivas to C. Campsen	SCSENATE_00027293	Relevance; Hearsay; Cumulative
617	November 12, 2022 Email from P. Benson to A. Fiffick with attachment	SCSENATE_00022614- SCSENATE_00022618	Relevance; Hearsay; Cumulative
618	November 30, 2021 Email from A. Fiffick to T. Young with attachment	SCSENATE_00022597- SCSENATE_00022598	Relevance; Hearsay; Cumulative
619	January 16, 2022 Email from J. Suddeh to Senate Redistricting	SCSENATE_00022513	Relevance; Hearsay; Cumulative
620	January 19, 2022 Email from B. John to A. Fiffick with attachment	SCSENATE_00022699- SCSENATE_00022703	Relevance; Hearsay; Cumulative
621	January 26, 2022 Email from A. Harwell-Beach to W. Roberts	SCSENATE_00021591	Relevance; Hearsay; Cumulative
622	January 19, 2022 Email from A. Fiffick to L. Rankin with attachment	SCSENATE_00021748- SCSENATE_00021750	Relevance; Hearsay; Cumulative
623	January 20, 2022 Email from A. Fiffick to L. Rankin with attachment	SCSENATE_00021755- SCSENATE_00021758	Relevance; Hearsay; Cumulative
624	January 20, 2022 Email from A. Fiffick to L. Rankin with attachment	SCSENATE_00021771- SCSENATE_00021775	Relevance; Hearsay; Cumulative
625	January 18, 2022 Email from A. Fiffick to B. John with attachment	SCSENATE_00022292- SCSENATE_00022294	Relevance; Hearsay; Cumulative
626	January 17, 2022 Email from R. Oppermann to A. Fiffick with attachment	SCSENATE_00022514- SCSENATE_00022522	Relevance; Hearsay; Cumulative; Rule 702
627	January 16, 2022 Email from W. Roberts to A. Fiffick with attachment	SCSENATE_00022528- SCSENATE_00022530	Relevance; Hearsay; Cumulative

Exhibit #	Description	Bates Number (if applicable)	Objection
628	November 28, 2021 Email from W. Roberts to P. Benson with attachment	SCSENATE_00022607- SCSENATE_00022609	Relevance; Hearsay; Cumulative
629	October 8, 2021 Letter from L. Aden to L. Rankin with attachments	SCSENATE_00022627- SCSENATE_00022676	Relevance; Hearsay; Cumulative
630	January 11, 2021 W. Roberts detail map of Charleston County	SCSENATE_00022737	Relevance; Hearsay; Cumulative
631	September 30, 2021 Letter from L. Aden to L. Rankin	SCSENATE_00022749- SCSENATE_00022752	Relevance; Hearsay; Cumulative
632	August 21, 2021 Letter from L. Aden to L. Rankin	SCSENATE_00022961- SCSENATE_00022972	Relevance; Hearsay; Cumulative
633	October 8, 2021 Email from Senate Redistricting to A. Fiffick	SCSENATE_00024956- SCSENATE_00025008	Relevance; Hearsay; Cumulative
634	November 29, 2021 A. Fiffick draft talking points	SCSENATE_00025256- SCSENATE_00025257	Relevance; Hearsay; Cumulative
635	January 6, 2022 Email from C. Terreni to L. Rankin with attachments	SCSENATE_00027136- SCSENATE_00027148	Relevance; Hearsay; Cumulative
636	December 16, 2021 Email from A. Atkinson to C. Campsen	SCSENATE_00003882	Relevance; Hearsay; Cumulative
637	December 28, 2021 Email from A. Hink to C. Campsen	SCSENATE_00003884	Relevance; Hearsay; Cumulative
638	January 19, 2022 Draft talking points by B. John	SCSENATE_00022686- SCSENATE_00022692	Relevance; Hearsay; Cumulative
639	December 14, 2021 Email from J. Bowers to C. Campsen	SCSENATE_00027183	Relevance; Hearsay; Cumulative
640	December 14, 2021 Email from J. Dickson to C. Campsen	SCSENATE_00027185- SCSENATE_00027186	Relevance; Hearsay; Cumulative
641	January 12, 2022 Email from C. Campsen to J. Dickson	SCSENATE_00027210	Relevance; Hearsay; Cumulative
642	January 12, 2022 Email from C. Campsen to T. Seckinger	SCSENATE_00027226	Relevance; Hearsay; Cumulative
643	January 12, 2022 Email from C. Campsen to X. Li	SCSENATE_00027230	Relevance; Hearsay;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Cumulative
644	January 12, 2022 Email from X. Li to C. Campsen	SCSENATE_00027232	Relevance; Hearsay; Cumulative
645	January 12, 2022 Email from X Li	SCSENATE_00027236	Relevance; Hearsay; Cumulative
646	January 15, 2022 Email from C. Campsen to J. Cribb	SCSENATE_00027260- SCSENATE_00027261	Relevance; Hearsay; Cumulative
647	December 13, 22 Email from A. Hehir to C. Campsen	SCSENATE_00027298	Relevance; Hearsay; Cumulative
648	January 12-13, 2022 Text exchange between X. Li & C. Campsen	SCSENATE_00027301- SCSENATE_00027316	Relevance; Hearsay; Cumulative
649	January 19, 2022 B. John draft talking points	SCSENATE_00022711- SCSENATE_00022717	Relevance; Hearsay; Cumulative
650	January 2022 B. John talking points	SCSENATE_00025177- SCSENATE_00025184	Relevance; Hearsay; Cumulative
651	January 19, 2022 B. John draft talking points	SCSENATE_00022704- SCSENATE_00022710	Relevance; Hearsay; Cumulative
652	January 19, 2022 Email from L. Teague to A. Fiffick with attachment	SCSENATE_00003247- SCSENATE_00003250	Relevance; Hearsay; Cumulative
653	January 10, 2022 Analysis of Sabb Least Change Plan	SCSENATE 00026554, SCSENATE 00026559	Relevance; Hearsay; Cumulative
654	January 11-13, 2022 Text exchange between L. Rankin & A. Fiffick	SCSENATE_00025258- SCSENATE_00025270	Relevance; Hearsay; Cumulative
655	December 1, 2021 Email from M. Blizzard	SCSENATE_00024760- SCSENATE_00024761	Relevance; Hearsay; Cumulative
656	December 2, 2021 Email from A. Kleinman	SCSENATE_00024758- SCSENATE_00024759	Relevance; Hearsay; Cumulative
657	December 29, 2021 Email from T. Jones to House Redistricting	SC_HOUSE_0108857- SC_HOUSE_0108858	Hearsay; Foundation
658	July 19, 2021 Email from M. McGee to L. Rankin and attachments	SCSENATE_00024916- SCSENATE_00024930	Relevance; Hearsay; Cumulative
659	October 8, 2021 Email from Senate Redistricting and attachments	SCSENATE_00024956- SCSENATE_00025008	Relevance; Hearsay;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Cumulative
660	September 10, 2021 Email from M. Baker to M. Faulk and attachment	SCSENATE_00022950- SCSENATE_00022953	Relevance; Hearsay; Cumulative
661	August 2, 2021 Email from M. Baker to M. Fiffick and attachments	SCSENATE_00022959- SCSENATE_00022972	Relevance; Hearsay; Cumulative
662	November 9, 2021 Email from P. Benson to M. Baker with attachment	SCSENATE_00023929- SCSENATE_00023931	Relevance; Hearsay; Cumulative
663	November 22, 2021 Email from M. Baker to P. Benson with attachments	SCSENATE_00023577- SCSENATE_00023635	Relevance; Hearsay; Cumulative
664	November 19, 2021 Email from M. Baker to P. Benson with attachments	SCSENATE_00023636- SCSENATE_00023730	Relevance; Hearsay; Cumulative
665	November 23, 2021 Email from J. Potter to P. Dennis with attachment	SC_HOUSE_0091403- SC_HOUSE_0091409	Hearsay; Cumulative
666	January 10, 2022 Email from E. Dean to C. Murphy & attachment	SC_HOUSE 0106698	Inadequately identified; Hearsay; Cumulative; Relevance
667	January 10, 2022 Email from E. Dean to P. Dennis & attachment	SC_HOUSE_0111640 (with linked materials)	Inadequately identified; Undisclosed; Relevance; Hearsay
668	August 16, 2021 Email from F. Barba to L. Rankin	SCSENATE_00003856	Relevance; Hearsay; Cumulative
669	October 18, 2021 Email from S. Axson to L. Rankin	SCSENATE_00003857	Relevance; Hearsay; Cumulative
670	January 4, 2022 Email from S. Seidman to L. Rankin	SCSENATE_00003858	Relevance; Hearsay; Cumulative
671	December 23, 2021 Email from H. Limbert to L. Rankin	SCSENATE_00003859	Relevance; Hearsay; Cumulative
672	December 13, 2021 Email from C. Haber to L. Rankin	SCSENATE_00003860	Relevance; Hearsay; Cumulative
673	December 13, 2021 Email from W. Boyd to L. Rankin	SCSENATE_00003861	Relevance; Hearsay; Cumulative

Exhibit #	Description	Bates Number (if applicable)	Objection
674	December 13, 2021 Email from E. Simkins to L. Rankin	SCSENATE_00003862	Relevance; Hearsay; Cumulative
675	December 13, 2021 Email from E. Bell to L. Rankin	SCSENATE_00003863	Relevance; Hearsay; Cumulative
676	December 13, 2021 Email from H. Chapman to L. Rankin	SCSENATE_00003864	Relevance; Hearsay; Cumulative
677	December 14, 2021 Email from D. Groce to L. Rankin	SCSENATE_00003865	Relevance; Hearsay; Cumulative
678	December 14, 2021 Email from A. Steele to L. Rankin	SCSENATE_00003866	Relevance; Hearsay; Cumulative
679	December 14, 2021 Email from F. Palm to L. Rankin	SCSENATE_00003867	Relevance; Hearsay; Cumulative
680	December 14, 2021 Email from J. Reeves to L. Rankin	SCSENATE_00003868	Relevance; Hearsay; Cumulative
681	December 14, 2021 Email from B. Smart to L. Rankin	SCSENATE_00003869	Relevance; Hearsay; Cumulative
682	December 14, 2021 Email from J. Bellack to L. Rankin	SCSENATE_00003870	Relevance; Hearsay; Cumulative
683	December 14, 2021 Email from L. Eisenstein to L. Rankin	SCSENATE_00003871	Relevance; Hearsay; Cumulative
684	December 14, 2021 Email from L. Daugherty to L. Rankin	SCSENATE_00003872	Relevance; Hearsay; Cumulative
685	December 13, 2021 Email from J. Munkers to L. Rankin	SCSENATE_00003873	Relevance; Hearsay; Cumulative
686	December 14, 2021 Email from R. Hagerty to L. Rankin	SCSENATE_00003874	Relevance; Hearsay; Cumulative
687	December 14, 2021 Email from E. Stajcer to L. Rankin	SCSENATE_00003875	Relevance; Hearsay; Cumulative
688	December 14, 2021 Email from J. Wilson to L. Rankin	SCSENATE_00003876	Relevance; Hearsay; Cumulative
689	December 15, 2021 Email from R. Gill to L. Rankin	SCSENATE_00003877	Relevance; Hearsay;

Exhibit #	Description	Bates Number (if applicable)	Objection
			Cumulative
690	December 15, 2021 Email from S. Willis to L. Rankin	SCSENATE_00003878	Relevance; Hearsay; Cumulative
691	December 15, 2021 Email from J. Haley to L. Rankin	SCSENATE_00003879	Relevance; Hearsay; Cumulative
692	December 16, 2021 Email from J. Zillioux to L. Rankin	SCSENATE_00003880	Relevance; Hearsay; Cumulative
693	December 18, 2021 Email from R. Pisoni to L. Rankin	SCSENATE_00003881	Relevance; Hearsay; Cumulative
694	December 18, 2021 Email from A. Atkinson to L. Rankin	SCSENATE_00003882	Relevance; Hearsay; Cumulative
695	December 22, 2021 Email from A. Dupre to L. Rankin	SCSENATE_00003883	Relevance; Hearsay; Cumulative
696	December 28, 2021 Email from A. Hink to L. Rankin	SCSENATE_00003884	Relevance; Hearsay; Cumulative
697	December 20, 2021 Email from M. Kuchera to L. Rankin	SCSENATE_00003885	Relevance; Hearsay; Cumulative
698	January 23, 2021 Email from A. Atkinson to L. Rankin	SCSENATE_00003886	Relevance; Hearsay; Cumulative
699	December 15, 2021 Email from G. Smith to L. Rankin	SCSENATE_00003888	Relevance; Hearsay; Cumulative
700	Weston Newton Text Message	SC_HOUSE-0112539	Relevance; Hearsay
701	Weston Newton Text Message	SC_HOUSE-0112541	Relevance; Hearsay
702	Weston Newton Text Message	SC_HOUSE-0112542	Relevance; Hearsay
703	Weston Newton Text Message	SC_HOUSE-0112543	Relevance; Hearsay
704	Weston Newton Text Message	SC_HOUSE-0112544	Relevance; Hearsay
705	Weston Newton Text Message	SC_HOUSE-0112552	Relevance; Hearsay; Cumulative
706	Weston Newton Text Message	SC_HOUSE-0112554	Relevance; Hearsay
707	Weston Newton Text Message	SC_HOUSE-0112530	Hearsay

Exhibit #	Description	Bates Number (if applicable)	Objection
708	Weston Newton Hearing Notes	SC_HOUSE-0112187	Relevance; Hearsay
709	House Map Room Policies and Procedures	SC_HOUSE-0112284	
710			
711			
712	*PLACEHOLDER -- For any and all documents produced after August 12, 2022		Inadequately identified; Hearsay; Foundation; Authenticity

*Plaintiffs asserted that they reserved the right to identify additional exhibits for materials they allege were not timely produced (including all documents produced after August 12, despite the fact that Plaintiffs filed their Exhibit List on August 26, 2022). Plaintiffs further reserved the right to identify additional exhibits for impeachment purposes and to use any exhibits offered and admitted on Defendants' Exhibit Lists. Plaintiffs also reserved the right to create additional demonstrative exhibits. As noted in Legislative Defendants' Objections, they object to these unlimited open-ended reservations of rights.